

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

STEPHANIE SCHOLL and FRANK BEDNARZ,

Plaintiffs,

v.

ILLINOIS STATE POLICE; BRENDAN F. KELLY,
in his official capacity as Director of the
Illinois State Police; JAY ROBERT PRITZKER,
in his official capacity as Governor of the
State of Illinois; KWAME RAOUL, in his
official capacity as Attorney General of
Illinois,

Defendants.

Case No. 1:24-cv-4435

Hon. Judge Martha M. Pacold

**Plaintiffs' Notice of Supplemental
Authority**

Plaintiffs submit this Notice of Supplemental Authority to bring to the Court's attention new information not previously known about the broadcasting of automated license plate reader (ALPR) data to the public at large, via the public internet, from the ALPR cameras operated by Defendants. This information was not available to Plaintiffs when their brief was filed but Plaintiffs feel this information is highly relevant to this Courts consideration of the pending motions.

An article published in January 8, 2025, by Chicago Reader, outlines the findings of internet security researcher Matt Brown, who via his YouTube channel has released several videos in which he shows that the images and data captured by Illinois' ALPRs are freely available for anyone with some basic technical know-how.¹ "Brown discovered that certain Motorola Solutions automated license plate readers (ALPR) used by law enforcement in multiple states were incorrectly configured to stream video and detailed car information on an unsecured public network. This allows anyone with a computer to potentially find and track a person's location in real time."² Brown's research was used to identify cameras in Chicago and Illinois that are open to the public, based on their IP addresses. "[A]t least 172 cameras are open to the public including 14 whose IP addresses indicate they are located in Chicago and another 28 whose IP's place them in Naperville."³

These revelations demonstrate that the information collected by automated license plate readers in Chicago and Illinois is not secure, and presents an even greater risk to the privacy and

¹ Shawn Mulcahy, "On display, researchers identified more than 170 police surveillance cameras that broadcast sensitive information to the open Internet," Chicago Reader, January 8, 2025, <https://chicagoreader.com/news/license-plate-motorola-privacy/>

² *Id.*

³ *Id.*

safety of citizens like Plaintiffs than previously understood. The ALPRs that the Illinois State Police (“ISP”) has installed are made by Vigilant, a subsidiary of Motorola Solutions, the company implicated in Brown’s research, and IP address data indicates that at least 14 of the compromised cameras are located in Chicago. *See* Compl. ¶ 31. *Anyone* can currently view video these ALPR cameras, and receive the public data feed from the cameras and use it to track someone’s location in real time. The information exposed to the public internet from the unsecured ALPR cameras includes the live video stream of vehicles on the road (both full-color and infrared) as well as logged license plate information, vehicle make, vehicle color, vehicle model, and images of each vehicle that passes the ALPR camera.⁴ The information can be accessed by anyone with a computer, law enforcement or civilian, friend or foe, without consent, a warrant or any suspicion of wrongdoing. No hacking is required to access this data; the information is on the open internet and available to anyone, without password protection or any login credentials to authenticate or even track the identity of the person accessing the data.⁵

Brown’s YouTube video demonstrating public access to these ALPR feeds shows a camera located in Illinois and he even comments that many more of the accessible cameras are likely located in Illinois based upon the concentration of Illinois license plates shown on the feeds. *Id.* at 5:06-5:54, 13:08-18. Brown goes on to comment: “State of Illinois you really need to get on it, you’ve left these devices all out in the open and everybody’s data is there for the taking.” *Id.* at 13:20-29. The broadcasting of this tracking data gives anyone unfettered access to information

⁴ Information from Will Freeman’s website

<https://github.com/frillweeman/alprleaks/blob/master/README.md>, (referenced and linked in Chicago Reader article)

⁵ Matt Brown, Public Video and Data Feeds of Highway License Plate Readers, January 6, 2025, <https://www.youtube.com/watch?v=0dUnY1641WM> (referenced and linked in Chicago Reader article)

about Plaintiffs' whereabouts in real time. The ALPR system has created and facilitated an unreasonable invasion of Plaintiffs' privacy, and the privacy of all Cook County drivers.

For these reasons, Plaintiffs bring this information to the Court's attention and submit that it further supports their position that the ISP's use of automated license plate readers constitutes an invasion of Plaintiffs' privacy in violation of the Fourth Amendment's prohibition on unreasonable searches.

Dated: January 13, 2025

Respectfully Submitted,

Stephanie Scholl and Frank Bednarz

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